

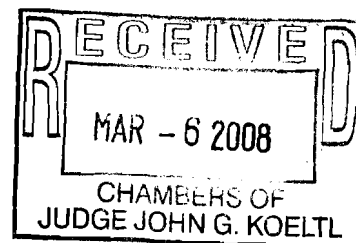
GLENN A. WOLTHER
ATTORNEY AT LAW
305 BROADWAY - SUITE 1102
NEW YORK, NEW YORK 10007
TEL: (212) 964-2120
FAX: (212) 964-0763

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March 6, 2008

VIA FACSIMILE (212) 805-7912

The Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007



RE: *Christopher Mangal et al v. City of New York, et al.*
07 CV 3777 (JGK)

Dear Judge Koeltl:

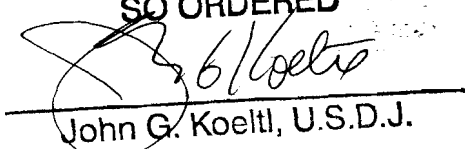
I represent the plaintiffs in the above referenced action and write to respectfully request that the Court (i) extend the close of discovery sixty days, from May 23, 2008 until July 24, 2008 and (ii) concomitantly extend the remaining deadlines by sixty days. Defense counsel, Assistant Corporation Counsel Johana V. Castro, consents to this request.

There are several reasons for this request. First, at this juncture plaintiffs are not yet aware of the identities of the John and Jane Doe defendants. Once this information is ascertained, plaintiffs will be able to amend the complaint accordingly.

In addition, plaintiffs are still unaware of the proper service address for undercover police officer #974, and so have been unable to serve this defendant with the summons and complaint. I am informed by Ms. Castro that the City will provide plaintiffs with this address shortly, and that the defendants consent to an extension of time under Rule 4(m) to serve this defendant.

Finally, the parties are still in the process of exchanging discovery, but cannot fully complete this process until the new parties have been identified and appear in the case. The parties have also begun settlement discussions, and hope that the additional time will assist in this regard. Finally, Ms. Castro will be out of the country on vacation in the near future.

APPLICATION GRANTED
SO ORDERED

3/6/08

John G. Koeltl, U.S.D.J.

This is the first request for such an enlargement of time. Accordingly, plaintiffs respectfully ask that the Court grant this request to extend the close of discovery by sixty days, from May 23, 2008 until July 24, 2008.

Thank you for your time and consideration in this matter.

Respectfully submitted,

Glenn A. Wolther (GW-5740)

cc: Johanna V. Castro, ACC
New York City Law Department (via fax)